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10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT
12
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,)	NO. CV 02-5698-RJK(CTx)
)	
16 Plaintiff,)	CONSENT JUDGMENT
)	
17 v.)	
)	
18 ALL RIGHT, TITLE, AND INTEREST)	
IN CERTAIN BANK ACCOUNTS AND)	
19 SECURITIES ACCOUNTS BEING HELD)	
OR CONTROLLED BY ASIAN CHARTER)	
20 LTD. AND ITS RELATED ENTITIES)	
AND INDIVIDUALS,)	
)	
21 Defendants.)	
)	
22)	
23)	
24)	
25)	

26 WHEREAS on July 2, 2003, plaintiff United States of America
27 (the "government") filed its Fourth Amended Complaint for
28 Forfeiture in this action against all right, title, and interest

1 in the following accounts and their subsidiary accounts, being
2 held or controlled by the following entities and individuals:

- 3 (a) Account no. 382171 in the name of Asian Charter
4 Ltd. at Wing Hang Bank, Wing Hang Bank Building,
5 161 Queen's Road, Central, Hong Kong;
- 6 (b) Account no. 382199 in the name of Equal Rich Ltd.
7 at Wing Hang Bank, Wing Hang Bank Building, 161
8 Queen's Road, Central, Hong Kong;
- 9 (c) Account no. 055982 in the name of Founding Garment
10 Ltd. at Wing Hang Bank, Wing Hang Bank Building,
11 161 Queen's Road, Central, Hong Kong;
- 12 (d) Account no. 356804 in the name of Kinson Garments
13 Ltd. at Wing Hang Bank, Wing Hang Bank Building,
14 161 Queen's Road, Central, Hong Kong;
- 15 (e) Account no. 792484 in the name of Newshine Ltd. at
16 Wing Hang Bank, Wing Hang Bank Building, 161
17 Queen's Road, Central, Hong Kong;
- 18 (f) Account no. 855292 in the name of David Kirby at
19 Wing Hang Bank, Wing Hang Bank Building, 161
20 Queen's Road, Central, Hong Kong;
- 21 (g) Account no. 857429 in the name of Armando Salcedo
22 at Wing Hang Bank, Wing Hang Bank Building, 161
23 Queen's Road, Central, Hong Kong;
- 24 (h) Account no. 797920 in the name of Chin Wai Ming at
25 Wing Hang Bank, Wing Hang Bank Building, 161
26 Queen's Road, Central, Hong Kong;
- 27
- 28

- 1 (i) Account no. 055991 in the name of Lin Pang Hum at
2 Wing Hang Bank, Wing Hang Bank Building, 161
3 Queen's Road, Central, Hong Kong;
- 4 (j) Account no. 139393 in the name of The Link Trading
5 Company Limited at Wing Hang Bank, Wing Hang Bank
6 Building, 161 Queen's Road, Central, Hong Kong;
- 7 (k) Account no. 235219 in the name of Bismack
8 Industrial Ltd. at Wing Hang Bank, Wing Hang Bank
9 Building, 161 Queen's Road, Central, Hong Kong;
- 10 (l) Account no. C094 in the name of Chin Wai Ming at
11 Evergreen Securities Ltd., 1703-4 Chinachem Tower,
12 34-37 Connaught Road, Central, Hong Kong;
- 13 (m) Account no. S038 in the name of Superior Treasure
14 Investment Ltd. at Evergreen Securities Ltd.,
15 1703-4 Chinachem Tower, 34-37 Connaught Road,
16 Central, Hong Kong;
- 17 (n) Account no. A008 in the name of Asia Chief Ltd. at
18 Evergreen Securities Ltd., 1703-4 Chinachem Tower,
19 34-37 Connaught Road, Central, Hong Kong;
- 20 (o) Account no. 719908 in the name of Lin Pang Hum at
21 Lippo Securities Ltd., 2302 Tower One, Lippo
22 Center, 89 Queens Way, Central, Hong Kong;
- 23 (p) Account no. 723928 in the name of Superior
24 Treasure Investment Ltd. at Lippo Securities Ltd.,
25 2302 Tower One, Lippo Center, 89 Queens Way,
26 Central, Hong Kong; and
27
28

1 (q) Account no. 002-CA072 in the name of Asia Chief
2 Ltd. at Sungrowth Securities Ltd., 7/F Chinachem
3 Tower, 34-37 Connaught Road, Central, Hong Kong
4 (collectively with the accounts listed in (a)
5 through (p), the "defendant assets").

6 WHEREAS the government has caused process to be served on
7 the defendant assets, notice to be published, and claim letters
8 to be served,

9 WHEREAS claimant Armando Salcedo has filed a claim and
10 answer contesting forfeiture of Account no. 857429 in the name of
11 Armando Salcedo at Wing Hang Bank, Wing Hang Bank Building, 161
12 Queen's Road, Central, Hong Kong (the "Salcedo Account"),

13 WHEREAS no potential claimant other than claimant Armando
14 Salcedo has appeared in this action, and the time for making an
15 appearance have expired,

16 WHEREAS on March 16, 2006, the Clerk of the Court entered
17 default of Lin Pang Hum and David Kirby,

18 WHEREAS on March 27, 2006, the Clerk of the Court entered
19 default of Asian Charter Ltd., Asia Chief Ltd., Bismack
20 Industrial Ltd., Chin Wai Ming, Equal Rich Ltd., Founding Garment
21 Ltd., Kinson Garments Ltd., Newshine Ltd., Superior Treasure
22 Investment Ltd., The Link Trading Co., Ltd., and all other
23 potential claimants other than claimant Armando Salcedo,

24 WHEREAS on July 31, 2006, this Court entered the Default
25 Judgment of Forfeiture of all defendant bank accounts with the
26 sole exception of the Salcedo Account,

1 The Court, having been duly advised of and having considered
2 the matter, and based upon the mutual consent of claimant Armando
3 Salcedo and potential claimant Maricela Salcedo (collectively,
4 the "claimants"), and the government, HEREBY ORDERS, ADJUDGES,
5 AND DECREES:

6 1. This Court has jurisdiction over this action pursuant to
7 28 U.S.C. §§ 1345 and 1355.

8 2. The Fourth Amended Complaint for Forfeiture states
9 claims for relief pursuant to 18 U.S.C. §§ 981(a)(1)(A),
10 981(a)(1)(C) and 984.

11 3. Notice of this action has been given as required by law.
12 No appearance has been made in this action by any person other
13 than claimant Armando Salcedo, and the time for making an
14 appearance has expired. The Default by Clerk has been entered
15 against all potential claimants other than claimant Armando
16 Salcedo, and the Default Judgment of Forfeiture has been entered
17 against the defendant assets, with the sole exception of the
18 Salcedo Account.

19 4. All right, title, and interest in and to the Salcedo
20 Account are hereby forfeited to the government, and no other
21 right, title, or interest shall exist therein. The government
22 shall dispose of the same according to law.

23 5. The claimants shall take whatever steps are necessary
24 to pass to the United States clear title to the Salcedo Account,
25 including, without limitation, all reasonable measures necessary
26 to repatriate the funds in the Salcedo Account from Hong Kong to
27

1 the United States. Such measures shall include, without
2 limitation, abandoning opposition to the restraint of the funds
3 by the Hong Kong Department of Justice and agreeing to
4 termination of any proceedings brought by the Hong Kong
5 Department of Justice against the funds.

6 6. The claimants hereby release the United States of
7 America, the State of California, all counties, municipalities
8 and cities within the State of California, and any of foregoing's
9 agencies, departments, offices, agents, employees and officers,
10 including, but not limited to, the United States Attorney's
11 Office, the United States Customs Service, the United States
12 Immigration and Customs Enforcement, and any of the foregoing's
13 employees and agents, from any and all, known or unknown, claims,
14 causes of action, rights, and liabilities, including, without
15 limitation, any claim for attorney's fees, costs, or interest
16 which may be now or later asserted by or on behalf of the
17 claimants, arising out of or related to this action. The
18 claimants represent and agree that they have not assigned and are
19 the rightful owners of such claims, causes of action and rights.

20 7. The Court finds that there was reasonable cause for the
21 restraint of the Salcedo Account in Hong Kong and institution of
22 these proceedings. This judgment shall be construed as a
23 certificate of reasonable cause pursuant to 28 U.S.C. § 2465.

24 / / /

8. The parties shall each bear their own attorney's fees
and other costs and expenses of litigation.

DATED: March 4, 2008

UNITED STATES DISTRICT JUDGE

CONSENT

The parties consent to judgment and waive any right of
appeal.

DATED: Feb. 22, 2008

THOMAS P. O'BRIEN
United States Attorney
CHRISTINE C. EWELL
Assistant United States Attorney
Chief, Criminal Division
STEVEN R. WELK
Assistant United States Attorney
Chief, Asset Forfeiture Section
PIO S. KIM
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DATED: _____, 2008

ARMANDO SALCEDO

DATED: _____, 2008

MARICELA SALCEDO

Approved as to form and content.

DATED: _____, 2008

DONALD M. RE
Attorney for claimant
Armando Salcedo

DATED: _____, 2008

ELON A. POLLACK
Attorney for potential claimant
Maricela Salcedo

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1 8. The parties shall each bear their own attorney's fees
2 and other costs and expenses of litigation.

3 DATED: _____, 2008

UNITED STATES DISTRICT JUDGE

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8 DATED: _____, 2008

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Assistant United States Attorney
Chief, Asset Forfeiture Section

PIO S. KIM
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Attorneys for Plaintiff
UNITED STATES OF AMERICA

16 DATED: 2-20, 2008

ARMANDO SALCEDO

18 DATED: _____, 2008

{see next page}
MARICELA SALCEDO

20 Approved as to form and content.

22 DATED: 2-10, 2008

DONALD M. RE
Attorney for claimant
Armando Salcedo

25 DATED: _____, 2008

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ELON A. POLLACK
Attorney for potential claimant
Maricela Salcedo

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Attorneys for Plaintiff
UNITED STATES OF AMERICA

16 DATED: _____, 2008

ARMANDO SALCEDO

18 DATED: 2-20, 2008

Maricela Salcedo
MARICELA SALCEDO

21 Approved as to form and content.

22 DATED: _____, 2008

DONALD M. RE
Attorney for claimant
Armando Salcedo

25 DATED: _____, 2008

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ELON A. POLLACK
Attorney for potential claimant
Maricela Salcedo

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002

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PIO S. KIM
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

16 DATED: _____, 2008

ARMANDO SALCEDO

18 DATED: _____, 2008

MARICELA SALCEDO

20 Approved as to form and content.

22 DATED: _____, 2008

DONALD M. RE
Attorney for claimant
Armando Salcedo

25 DATED: Feb. 21, 2008



ELON A. POLLACK
Attorney for potential claimant
Maricela Salcedo

PROOF OF SERVICE BY MAILING

I am over the age of 18 and not a party to the within action.
I am employed by the Office of the United States Attorney, Central District of California. My business address is 312 North Spring Street, 14th Floor, Los Angeles, California 90012.

On February 22, 2008, I served a CONSENT JUDGMENT on each person or entity named below by enclosing a copy in an envelope addressed as shown below and placing the envelope for collection and mailing on the date and at the place shown below following our ordinary office practices.

TO: DONALD M. RE
LAW OFFICES
ONE WILSHIRE BUILDING
624 SOUTH GRAND AVENUE, 22ND FLOOR
LOS ANGELES, CA 90017

X I am readily familiar with the practice of this office for collection and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

___ Via Hand Delivery

___ Via Fax

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on: February 22, 2008 at Los Angeles, California.


TERESA MARTINEZ